

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re Docket No. 9, 61

**CERTIFICATION OF COUNSEL REGARDING MOTION FOR ENTRY OF INTERIM
AND FINAL ORDERS: (I) AUTHORIZING DEBTORS TO PAY PREPETITION
CLAIMS OF CRITICAL VENDORS, FOREIGN VENDORS, 503(B)(9) CLAIMANTS,
AND LIEN CLAIMANTS; (II) GRANTING ADMINISTRATIVE EXPENSE PRIORITY
TO ALL UNDISPUTED OBLIGATIONS ON ACCOUNT OF OUTSTANDING
ORDERS; (III) AUTHORIZING ALL FINANCIAL INSTITUTIONS TO HONOR ALL
RELATED PAYMENT REQUESTS; AND (IV) GRANTING RELATED RELIEF**

The undersigned hereby certifies that:

1. On August 14, 2023, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Motion for Entry of Interim and Final Orders: (I) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(B)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing all Financial Institutions to Honor all Related Payment Requests; and (IV) Granting Related Relief* [Docket No. 9] (the “Motion”).

2. Pursuant to the *Notice of Hearing on Motion for Entry of Interim and Final Orders: (I) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(B)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense*

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc. principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing all Financial Institutions to Honor all Related Payment Requests; and (IV) Granting Related Relief [Docket No. 69], objections to entry of a final order granting the Motion were due no later than August 31, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The Debtors received informal responses from the Official Committee of Unsecured Creditors (the “Committee”). No party filed an answer, objection, or other responsive pleading to the Motion on the Court’s docket.

4. Attached hereto as **Exhibit A** is a revised proposed form of order approving the Motion on a final basis which incorporates the comments of the Committee (the “Proposed Final Order”).

5. A blacklined copy of the Proposed Final Order is attached hereto as **Exhibit B**, showing changes from the Final Order submitted with the Motion.

6. Accordingly, the Debtors request that the Proposed Final Order attached hereto as **Exhibit A** be entered at the Court’s earliest convenience.

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Dated: September 12, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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